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10 **UNITED STATES DISTRICT COURT**
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12 **DISTRICT OF NEVADA**
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14 JOSEPH MORGAN, an Individual
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16 Case No.: 2:19-cv-02239-KJD-DJA
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18 Plaintiff,
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20 vs.
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22 STATE OF NEVADA, *ex rel.* its
23 DEPARTMENT OF BUSINESS AND
INDUSTRY, STATE OF NEVADA, *ex rel.* its
TAXICAB AUTHORITY; BRUCE
24 BRESLOW, in his individual capacity; TERRY
REYNOLDS, in his individual capacity;
SCOTT WHITTEMORE, in his individual
capacity; RUBEN AQUINO, in his individual
capacity; GENEVIEVE HUDSON, in her
individual capacity; RONALD GROGAN, in
his individual capacity;
CHARLES HARVEY, in his individual
capacity; ANTOINE “CHRIS” RIVERS, in his
individual capacity; CJ MANTHE, in her
individual capacity; DOES I through X
inclusive; and ROES XI through XX, inclusive,

25 Defendants.
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27 **STIPULATION, REQUEST AND ORDER
TO EXTEND TIME TO ANSWER
COMPLAINT FOR DEFENDANTS STATE
OF NEVADA, EX REL. ITS
DEPARTMENT OF BUSINESS AND
INDUSTRY AND STATE OF NEVADA,
EX REL. ITS TAXICAB AUTHORITY**
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[FIRST REQUEST]

29 Pursuant to LR 7-1, Plaintiff JOSEPH MORGAN (“Plaintiff”), by and through his
30 counsel of record, E. Brent Bryson, Esq. of the Law Offices of E. Brent Bryson, LTD., and
31 Defendants STATE OF NEVADA, EX REL. ITS DEPARTMENT OF BUSINESS AND

1 INDUSTRY and STATE OF NEVADA, EX REL. ITS TAXICAB AUTHORITY (each an
2 “Agency Defendant” and collectively the “Agency Defendants”), by and through their attorneys
3 of record, AARON D. FORD, Attorney General for the State of Nevada, SCOTT H.
4 HUSBANDS, Deputy Attorney General, and GERALD L. TAN, Deputy Attorney General
5 hereby submit their Stipulation, Request, and Order Extending Time to Answer Plaintiff Joseph
6 Morgan’s Complaint. This is the first request for an extension of time to file an answer by the
7 Agency Defendants.

8 Plaintiff Joseph Morgan (“Mr. Morgan”) filed his Complaint (ECF No. 1) on December
9 30, 2019 (the “Complaint”). Mr. Morgan effected proper service on the Agency Defendants on
10 May 26, 2021, and May 27, 2021. Pursuant to Federal Rule of Civil Procedure 12(a), the
11 deadline for the Agency Defendants to answer or otherwise respond to the Complaint is June 16,
12 2021, and June 17, 2021.

13 Due to pre-existing professional obligations of counsel, the Agency Defendants need
14 additional time to prepare and file an answer to Mr. Morgan’s Complaint. The specific pre-
15 existing obligations conflicting with Agency Defendants’ counsel’s ability to answer the
16 Complaint by June 16, 2021, and June 17, 2021 include, among other things, three lengthy
17 hearings in May and June and related work to prepare for and follow up on those hearings.

18 Upon agreement by and between all the parties, through their respective counsel, the
19 undersigned counsel requests that this Court grant the Agency Defendants an extension of time,
20 up to and including, Friday, July 16, 2021, to file an answer to the Complaint.

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1 By entering into this stipulation, none of the parties waive any rights they have under statute,
2 law, or rule with respect to the Complaint.

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4 APPROVED AS TO FORM AND CONTENT this 15th day of June, 2021.

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6 By: /s/Scott H. Husbands
SCOTT H. HUSBANDS, ESQ.
7 Deputy Attorney General
Nevada Bar No. 11398
8 GERALD R. TAN
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10 **Attorney for Defendants**

11

12 By: /s/ E. Brent Bryson
E. BRENT BRYSON, ESQ.
E. BRENT BRYSON, LTD.
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Las Vegas, NV 89102
Attorney for Plaintiff

13 IT IS SO ORDERED:

14 DATED this 16th day of June, 2021.

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16 DANIEL J. ALBREGTS
17 UNITED STATES MAGISTRATE JUDGE

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